

EXHIBIT 19

Confidential - Pursuant to Protective Order

Page 1

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: JOHNSON &)
JOHNSON TALCUM POWDER)
PRODUCTS MARKETING)
SALES PRACTICES AND) MDL 16-2738
PRODUCT LIABILITY) (FLW) (LHG)
LITIGATION)
_____)
THIS DOCUMENT)
PERTAINS TO ALL CASES)

WEDNESDAY, DECEMBER 19, 2018

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

- - -

Videotaped deposition of Laura Plunkett, Ph.D., DABT, held at the Four Seasons Hotel, 999 North 2nd Street, St. Louis, Missouri, commencing at 9:12 a.m., on the above date, before Carrie A. Campbell, Registered Diplomate Reporter, Certified Realtime Reporter, Illinois, California & Texas Certified Shorthand Reporter, Missouri & Kansas Certified Court Reporter.

- - -

GOLKOW LITIGATION SERVICES
877.370.3377 ph | 917.591.5672 fax
deps@golkow.com

1 you can extrapolate with scientific basis
2 from one type of cancer cause to ovarian
3 cancer with respect to the heavy metals
4 specifically?

5 A. Well, I haven't attempted to
6 that, because I haven't attempted to define a
7 independent risk for each of those metals
8 individually.

9 The issue -- the issue I have
10 with those metals is -- there's a paragraph
11 here where I talk about pathogenesis of
12 carcinogenesis, where I talk about different
13 stages of cancer development and the fact
14 that inflammatory responses may be operating
15 at all those different stages.

16 So the issue is you have
17 potential -- you have compounds that are
18 known to produce cancer or have been shown to
19 have a potential risk of cancer. They share
20 a similar mechanism to talc, so as a result
21 of that, they factor into your risk
22 assessment as far as there being an exposure
23 to a mixture.

24 But on the issue of ovarian
25 cancer, I'm looking at the data that's been

1 collected on talc itself, which would be talc
2 with the constituents that could include the
3 metals. But certainly I'm not saying that it
4 is -- without the presence of one or the
5 other of these there would be no risk of
6 ovarian cancer. I'm not saying that either.

7 Q. So my question is, though, can
8 you point me either to scientific literature
9 directly documenting that these heavy metals
10 can cause ovarian cancer or to scientific
11 literature that enables you to extrapolate
12 from the types of cancer that they are known
13 or believed to cause to ovarian cancer?

14 A. So I -- on the issue of can I
15 point you to the data on ovarian cancer, I'd
16 have to go back. I can't answer that without
17 looking at the assessments.

18 But on the other -- second
19 question you asked me, that's the question I
20 was just trying to answer before. It's the
21 idea that regardless of where the cancer is
22 developing, the fact that these compounds
23 have the ability to stimulate similar toxic
24 responses in tissues could lead to a --
25 setting up a situation where the -- where the